

DORSEY, KING, GRAY, NORMENT & HOPGOOD
ATTORNEYS-AT-LAW

318 SECOND STREET
HENDERSON, KENTUCKY 42420

JOHN DORSEY (1920-1986)
FRANK N. KING, JR.
STEPHEN D. GRAY
WILLIAM B. NORMENT, JR.
J. CHRISTOPHER HOPGOOD
S. MADISON GRAY

TELEPHONE
(270) 826-3965
TELEFAX
(270) 826-6672
www.dkgnlaw.com

December 9, 2004

RECEIVED

DEC 10 2004

PUBLIC SERVICE
COMMISSION

FEDEX and FAX NO. 502-564-7279

Ms. Elizabeth O'Donnell
Executive Director
Public Service Commission of Kentucky
211 Sower Boulevard
Frankfort, Kentucky 40601

Re: Case No. 2004-00319

Dear Ms. O'Donnell:

Enclosed for filing is Motion to Reconsider on behalf of applicant Jackson Purchase Energy Corporation. This motion requests the Commission to reconsider its December 6, 2004, order in the above case granting full intervention to two (2) movants.

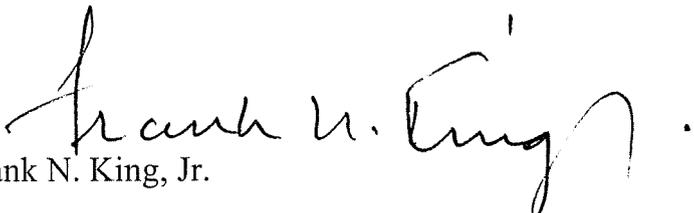
One of the movants, Ballard Rural Telephone Cooperative Corporation, Inc., has served and filed Motion to Suspend Tariff and Motion to Dismiss. We wish to inform the Commission that Jackson Purchase intends to respond to these two (2) motions and such response will be filed with the Commission not later than December 16, 2004.

Your assistance in this matter is appreciated.

Very truly yours,

DORSEY, KING, GRAY, NORMENT & HOPGOOD

By


Frank N. King, Jr.

FNKJr/cds

COPY/w/encls.: Attorney General of Kentucky, Office of Rate Intervention
Service List
Jackson Purchase Energy Corporation

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

DEC 10 2004

PUBLIC SERVICE
COMMISSION

In the Matter of:

APPLICATION OF JACKSON PURCHASE)
ENERGY CORPORATION FOR)
ADJUSTMENTS IN EXISTING CABLE)CASE NO. 2004-00319
TELEVISION ATTACHMENT TARIFF)

MOTION TO RECONSIDER

Now comes **JACKSON PURCHASE ENERGY CORPORATION** (“JPEC”), by counsel, and moves the Commission to reconsider the December 6, 2004, order in which the motions for full intervention of Kentucky Cable Telecommunications Association (“KCTA”) and Ballard Rural Telephone Cooperative Corporation Inc. (“Ballard Rural”) were granted. As grounds, JPEC states as follows:

1. JPEC filed a Response to KCTA’s motion on December 1, 2004, and filed an Objection to Ballard Rural’s motion on December 7, 2004. The regulations governing interventions do not establish a deadline for serving and filing such a response or objection, and JPEC’s Response and Objection were both served and filed within seven (7) days of the serving and filing of the underlying motions. Thus, JPEC’s filings were timely and any argument to the contrary is simply untenable.

2. It is the practice of the Commission to address in its orders any responses or objections to motions, and to state in the order reasons why the arguments

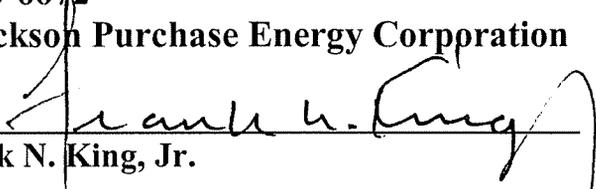
presented are either accepted or rejected. However, in its December 6, 2004, order the Commission made no mention of JPEC's Response or Objection.

3. JPEC is at a complete loss as to why the Commission did not consider its arguments and was so quick to issue December 6, 2004, order. However, due process – indeed, basic fairness – requires that JPEC be allowed to respond and/or object to a motion, and that the arbiter consider such in formulating its decision.

4. In light of JPEC's arguments in its Response and Objection the Commission should reconsider its rulings in the December 6, 2004, order and grant the relief that has been requested by JPEC. In any event, if JPEC's arguments are rejected, the Commission's reasons should be set forth in its order.

WHEREFORE, JPEC moves the Commission to reconsider its December 6, 2004, order; to grant the relief requested by JPEC in its Response and Objection; and further to grant JPEC all proper relief to which it may be entitled.

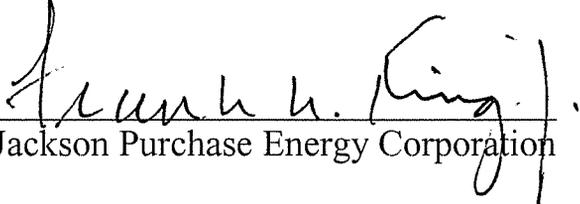
DORSEY, KING, GRAY, NORMENT & HOPGOOD
318 Second Street
Henderson, Kentucky 42420
Telephone (270) 826-3965
Telefax (270) 826-6672
Attorneys for Jackson Purchase Energy Corporation

By  _____
Frank N. King, Jr.

CERTIFICATE OF SERVICE

I hereby certify that the foregoing has been served upon the Attorney General of Kentucky, Office of Rate Intervention, 1024 Capital Center Drive,

Frankfort, KY 40601; Gardner F. Gillespie, Hogan & Harston, L.L.P., 555 Thirteenth Street, Washington, D.C. 20004-1109, and Frank F. Chuppe, Wyatt, Tarrant & Combs, LLP, 500 West Jefferson Street, Suite 2600, Louisville, KY 40202, attorneys for Kentucky Cable Telecommunications Association; and John E. Selent and Holly C. Wallace, Dinsmore & Shohl, LLP, 1400 PNC Plaza, 500 West Jefferson Street, Louisville, KY 40202, counsel to Ballard Rural Telephone Cooperative Corporation, Inc., by mailing a true and correct copy of same on this 9th day of December, 2004.



counsel for Jackson Purchase Energy Corporation